

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re:)	
)	
)	Case No. 13-53846
CITY OF DETROIT, MICHIGAN)	
)	Chapter 9
Debtor)	
)	Hon. Steven W. Rhodes
)	

**EX PARTE MOTION OF THE MACOMB INTERCEPTOR DRAIN
DRAINAGE DISTRICT FOR AN ORDER AUTHORIZING IT
TO FILE A REPLY BRIEF IN EXCESS OF PAGE LIMIT**

The Macomb Interceptor Drain Drainage District (the “MIDDD”), a creditor and party in interest in the above-captioned Chapter 9 bankruptcy case, hereby moves the Court for the entry of an order authorizing MIDDD to file the *Reply Brief in Support of Macomb Interceptor Drain Drainage District’s Temporary Allowance of Claim Pursuant to Rule 3018(a) For Purposes of Accepting or Rejecting the Debtor’s Fourth Amended Plan of Adjustment* (the “Reply”) in excess of the page limitations of Rule 9014-1(e) of the Local Rules for the United States Bankruptcy Court for the Eastern District of Michigan (the “Local Rules”), to the extent the limitation applies. In support of this motion, the MIDDD states as follows:

1. MIDDD requires 21 pages to fully respond to the issues raised by the *Debtor’s Brief in Support of its Response (Dkt. 5312) in Opposition to Macomb Interceptor Drain Drainage District’s Motion (Dkt. 5155) for Temporary Allowance of Claims Pursuant to Rule 3018(a) of the Federal Rules of Bankruptcy Procedure for Purposes of Accepting or Rejecting Debtor’s Fourth Amended Plan of Adjustment* [Docket No. 6015] (the “Debtor’s Brief”) and the *Brief of the Official Committee of Retirees in Support of Objection to Motion for Temporary*

Allowance of Claim of the Macomb Interceptor Drain Drainage District Pursuant to Rule 3018(a) [Docket No. 6013] (the “Retiree Committee’s Brief”). At 53 and 27 pages, respectively, the Debtor’s Brief and the Retiree Committee’s Brief contain a collective total of 80 pages of argument. MIDDD requires an excess of five pages with which to fully respond to those arguments and support its claim.

2. At 21 pages, the Reply exceeds the page limitations provided in the Local Rules. See Local Rule 9014-1(e) (providing a five-page limitation for reply briefs).

3. To the extent this Local Rule applies to the Reply, MIDDD requests entry of an order expanding the applicable page limitation.

[Remainder of Page Intentionally Left Blank]

WHEREFORE, MIDDD respectfully requests that this Court (i) enter an order substantially in the form attached hereto as Exhibit 1, granting the relief sought herein; and (ii) grant such other and further relief to MIDDD as the Court may deem proper.

Dated: July 17, 2014

Respectfully submitted,

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EXHIBIT 1

Proposed Form of Order

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re:)	
)	
CITY OF DETROIT, MICHIGAN)	Case No. 13-53846
)	
Debtor)	Chapter 9
)	
)	Hon. Steven W. Rhodes
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**EX PARTE ORDER AUTHORIZING THE MACOMB INTERCEPTOR DRAIN
DRAINAGE DISTRICT TO FILE A REPLY BRIEF IN EXCESS OF PAGE LIMIT**

This matter coming before the Court on the *Ex Parte Motion of the Macomb Interceptor Drain Drainage District to File a Reply Brief in Excess of Page Limit* (the “Motion”)¹ and the Court being fully advised in the premises;

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED.
2. MIDDD may file its *Reply Brief in Support of Macomb Interceptor Drain Drainage District’s Temporary Allowance of Claim Pursuant to Rule 3018(a) For Purposes of Accepting or Rejecting the Debtor’s Fourth Amended Plan of Adjustment* in excess of the applicable page limitation.

Dated: _____, 2014
Detroit, Michigan

THE HONORABLE STEVEN RHODES
UNITED STATES BANKRUPTCY JUDGE

¹ Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Motion.